

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST**

GARUD TECHNOLOGY SERVICES, INC.

Plaintiff,
v.

UNITED STATES

Defendant.

No. 23-1792 C

(Judge _____)

MOTION FOR A PROTECTIVE ORDER

Pursuant to Paragraph 17 of Appendix C, *Procedure in Protest Cases*, to the Rules of the United States Court of Federal Claims, Plaintiff, Garud Technology Services, Inc. (“GTS”), through undersigned counsel, moves this Court for a protective order.

1. GTS is an actual offeror in response to Solicitation No. 70BO4C23QOITESB2, as amended (the “Solicitation”), issued by the U.S. Department of Homeland Security – Customs and Border Protection (“CBP”).
2. GTS files this Motion along with its Complaint protesting the CBP’s unreasonable decision to consider two quotes submitted by GTS to be unacceptable.
3. The Complaint contains confidential and proprietary information and trade secrets of GTS, the public release of which would cause competitive harm to GTS.
4. The Complaint also contains source selection sensitive information, the public release of which could cause harm to the integrity of the competitive process.

WHEREFORE, GTS respectfully requests that the Court grant this motion, and issue its standard protective order.

Dated: October 12, 2023

Respectfully submitted,

Of Counsel:

Robert C. Starling

PILLSBURY WINTHROP

SHAW PITTMAN LLP

1650 Tysons Boulevard

McLean, VA 22102-4859

(703) 770-7528

(703) 770-7901 (fax)

robert.starling@pillsburylaw.com

/s/ John E. Jensen

John E. Jensen

PILLSBURY WINTHROP

SHAW PITTMAN LLP

1650 Tysons Boulevard

McLean, VA 22102-4859

(703) 770-7560

(703) 770-7901 (fax)

john.jensen@pillsburylaw.com

Whitney N. Alston

PILLSBURY WINTHROP

SHAW PITTMAN LLP

724 S. Figueroa Street, Suite 2800

Los Angeles, CA 90017

(213) 488-3639

(213) 488-1033 (fax)

whitney.alston@pillsburylaw.com

*Attorney of Record for Plaintiff
Garud Technology Services, Inc.*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was filed electronically via the CM/ECF system. A true and correct copy was also served by email to the following party, this 12th day of October 2023:

U.S. Department of Justice
Commercial Litigation Branch
1100 L Street, NW, 8th Floor
Washington, DC 20530
Fax: (202) 305-2062

E-mail: nationalcourts.bidprotest@usdoj.gov

/s/ Robert C. Starling
Robert C. Starling